

Office of Chief Counsel
Internal Revenue Service

memorandum

CC:PSI:B03:POSTN-150245-01
DAShulman

date: December 23, 2002

to: Henry T. Schafer Attorney CC:LM:CTM:SEA

from: JEANNE E. SULLIVAN
Senior Technician Reviewer
(Passthroughs and Special Industries)

subject: [REDACTED] Sham Transaction

On December 23, 2002, David Shulman and Jeanne Sullivan of CC:PSI:3, Tom Schafer of Seattle District Counsel, and Revenue Agent Catherine Jarvis of the Anchorage Office held a telephone conference to discuss [REDACTED] Sham Transaction, POSTN-150245-01.

This case was treated as a NASR/Reviewed Advice Memorandum (RAM), in which the National Office (CC:PSI and CC:IT&A) reviewed the field attorney's submission, and provided the field with comments orally. This memorandum memorializes that conversation.

Generally, CC:PSI agreed with the Field's factual description and arguments with the following caveats:

1) (b)(5)(AC),

(b)(5)(AC),

2)

(b)(5)(AC),

(b)(5)(AC),

3)

4)

If you need further assistance, please contact David Shulman or Jeanne Sullivan at 202-622-3080.